

KAREN WOHLFORTH, ESQ. (KD-0235)
ZELDA E. STEWART (ZES-8276)
299 Broadway suite 1700
New York, New York 10007
Tel. (212) 619-2457

Attorneys for the Plaintiff

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
JODY CONCEPCION,

Plaintiff

-against-

05 CV-08501-KMK-JCF

THE CITY OF NEW YORK, POLICE
OFFICER ALEXIS FERNANDEZ, and the
REPUBLICAN NATIONAL COMMITTEE,

Defendant
-----X

MOTION TO REMOVE AS COUNSEL

Karen Wohlforth, Esq. and Zelda Stewart, attorneys for the plaintiff in this action, hereby request that Leslie Lewis, Esq., be removed as counsel in the above action, pursuant to Rule 1.4 of the Local Rules of the Eastern and Southern Districts of New York.

Initially, a Notice of Appearance for the plaintiff was filed in this case by three attorneys, Karen Wohlforth, Esq., Zelda Stewart, Esq., and Leslie Lewis, Esq.

Attached hereto is a letter from the client, JODY CONCEPCION, explaining her reasons for changing attorneys, and requesting representation by Karen Wohlforth and Zelda Stewart only. It is apparent from the letter that the working relationship between the three attorneys in this case is no longer tenable.

In addition, the client, JODY CONCEPCION, signed a Consent to Change Attorneys, substituting Karen Wohlforth, Esq., and Zelda Stewart, Esq., in the place and stead of Leslie Lewis, Esq., Karen Wohlforth, Esq. and Zelda Stewart, Esq., in effect, discharging Ms. Lewis. Ms. Lewis has not as yet signed said Consent.

The case has been consolidated with other Republican National Convention cases for discovery purposes and is in the discovery stage at this time.

We herewith request that Ms. Lewis's compensation be fixed in quantum meruit if, as and when the case is resolved.

Dated: New York, New York
February 2, 2006

Respectfully submitted,



Karen Wohlforth, Esq. (KD-0235)

Zelda Stewart, Esq. (ZES-8276)

299 Broadway suite 1700

New York, New York 10007

Tel (KW) (212) 619-2457

(ZS) (212) 267-2889

January 26, 2006

Leslie Lewis, Esq.
Karen Wohlforth, Esq.
Zelda Stewart, Esq.

This is to advise that I hereby rescind the letter dated January 23, 2006 which I signed at the request of Leslie Lewis, Esq.

Ms. Lewis came to my place of employment on January 23, 2006, and advised me that she could no longer work with Karen Wohlforth and Zelda Stewart. She gave me the January 23, 2006 letter which she had previously prepared, and said that either I sign the letter or that she would take herself off the case. Based on statements that she made about Ms. Stewart and Ms. Wohlforth, and the fact that she advised me that there were time pressures involved, I signed Ms. Lewis' letter authorizing her to assume solitary representation of my interests in the case of Concepcion v. The City of New York et. al. I have now had an opportunity to discuss this matter with all counsel, and after much consideration I have decided to rescind the letter of January 23, 2006, and to retain Zelda Stewart and Karen Wohlforth as my counsel in this matter. Consequently, I no longer wish to retain the services of Leslie Lewis.


JODY CONCEPCION



X 317-Consent to Change (Substitution) of Attorney.

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Consent must be signed by attorney of record and signed and acknowledged by party. Type name beneath each signature.

UNITED STATES DISTRICT COURT
~~COUNTY OF~~ SOUTHERN DISTRICT OF NEW YORK

Index No.

JODY CONCEPCION,

05CV 8501 (KMK) (JCF)

Plaintiff(s)

against

CONSENT
TO CHANGE
ATTORNEY

THE CITY OF NEW YORK, POLICE OFFICER ALEXIS FERNANDEZ,
 Shield #29781, "JANE and JOHN DOES" 1-15, and the
 REPUBLICAN NATIONAL COMMITTEE,

Defendant(s)

IT IS HEREBY CONSENTED THAT

KAREN WOHLFORTH ESQ. and ZELDA STEWART,

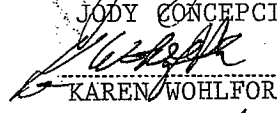
Esq.

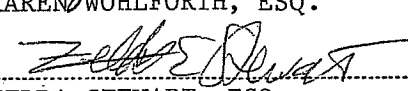
of No. 299 Broadway suite 1700 New York, New York

be substituted as attorney(s) of record for the undersigned party(ies) in the above entitled action in place
 and stead of the undersigned attorney(s) as of the date hereof.

Dated: New York, New York
 January 26, 2006


 JODY CONCEPCION


 KAREN WOHLFORTH, ESQ.


 ZELDA STEWART, ESQ.

LESLIE LEWIS, ESQ.

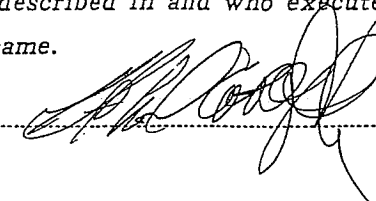
STATE OF NY
 COUNTY OF NY

ss.:

On the 26 day of January 2006, before me personally came


Jody Concepcion
 to me known, and known to me to be the same person described in and who executed the foregoing consent
 and acknowledged to me that s he executed the same.

KAREN FINKE WOHLFORTH
 Notary Public, State of New York
 No. 910000
 Commission Expires Feb. 23, 2006
 2006



CERTIFICATES OF SERVICE

It is hereby affirmed that the foregoing Motion to be Removed as counsel has been served via fax and mail this day of February, 2006, to LESLIE LEWIS, ESQ., 162 West 21st Street, New York, New York 10011, outgoing attorney for plaintiff., and upon Jeff Dougherty, Corporation Counsel, City of New York, for the defendants.


KAREN WOHLFORTH, ESQ.